

UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

CASE NO. 22-11150-G

L.T. Case No. 9:18-cv-80176-BB

IRA KLEIMAN, as the Personal
Representative of the Estate of
David Kleiman,

Appellant,

vs.

CRAIG WRIGHT,

Appellee.

**APPELLANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE OPENING BRIEF**

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**CERTIFICATE OF INTERESTED PERSONS AND
CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rule 26.1, Appellant IRA KLEIMAN, as the Personal Representative of the Estate of Dave Kleiman, respectfully submits the following Certificate of Interested Parties and Corporate Disclosure Statement:

1. Ira Kleiman
2. The Estate of David Kleiman
3. BTCN 1610-491 LLC
4. Boies Schiller Flexner LLP
5. Roche Freedman LLP

Appellant certifies that no publicly traded company or corporation has an interest in the outcome of the case of appeal.

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE
OPENING BRIEF**

Appellant respectfully moves for a 60-day extension of time, through July 18, 2022, to file the opening brief in this matter. Appellee does not oppose the requested extension.

Good cause exists to grant the extension. The Estate’s opening brief is currently due on May 18, 2022. As an initial matter, the record in this case is quite large. The District Court’s docket is over 890 entries long. The four-week trial transcript is nineteen (19) volumes, and there are over 369 trial exhibits. Moreover, since the notice of appeal was filed in the case, counsel of record has had numerous commitments, both professional and personal, that has made filing a brief by the 18th exceptionally difficult. These commitments include: (i) preparation for, and attendance at an unrelated trial in Miami Dade County, (ii) post-trial briefing in a major arbitration matter, (iii) preparation for oral argument scheduled before this Court on May 20, 2022, (iv) observance of the Passover Holiday, and (v) personal pre-scheduled family vacations.

No prior extensions have been requested by Appellant.

Certificate of Consultation. Pursuant to Eleventh Circuit Rule 26-1, Counsel for Appellee has authorized the undersigned to indicate that Appellee do not object to the requested extension of time.

For all the forgoing reasons, Appellant respectfully requests the Court extend the time in which to file its opening brief by 60-days, until July 18, 2022.

Dated May 9, 2022

Respectfully submitted,

s/ Devin (Velvel) Freedman

Devin (Velvel) Freedman, Esq.

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FED. R. APP. P. 32(g)(1) CERTIFICATE OF COMPLIANCE

I certify that this document complies with the type-volume limitation set forth in Fed. R. App. P. 27(d)(2). This document contains 227 words, excluding the parts exempted by Fed R. App. P. 32(f) and Eleventh Circuit Rule 32-4.

This document complies with Eleventh Circuit Rule 27-1(a)(10) and the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6). It has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman font.

s/ Devin (Velvel) Freedman

Devin (Velvel) Freedman

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 9, 2022, I electronically filed the foregoing document with the United States Eleventh Circuit Court of appeals using CM/ECF, which will automatically provide a copy to all counsel of record.

/s/ Devin (Velvel) Freedman

Devin (Velvel) Freedman